

MARY ELLMANN TANG (SBN 154340)
PATRICIA H. LYON (SBN 126761)
KEVIN E. FUSCH (SBN 255877)
FRENCH LYON TANG
A Professional Corporation
1990 N. California Blvd., Suite 300
Walnut Creek, CA 94596
Telephone: (925) 678-1876

Attorneys for Movant
CRISTINA MENDOZA

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In Re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY**

Debtors.

Case No. 19-30088 (DM)
Chapter 11
R.S. No. MET- 964

(Lead Case)
(Jointly Administered)

**NOTICE OF HEARING ON MOTION
FOR RELIEF FROM STAY**

- ☐ Affects PG&E Corporation
☒ Affects Pacific Gas and Electric Company
☐ Affects both Debtors

Hearing
Date: February 11, 2020
Time: 10:00 a.m.
Ctm: 17

**All papers shall be filed in the Lead Case, No.
19-30088(DM)*

PLEASE TAKE NOTICE that on February 11, 2020 at 10:00 a.m. at the above-entitled court located at 450 Golden Gate Avenue, 16th Floor, San Francisco, CA, Movant, CRISTINA MENDOZA, will move the court for an order terminating the automatic stay and ruling that Federal Rule of Bankruptcy Procedure 4001(a)(3) is waived.

This motion is made on the following grounds: Movant is entitled to relief from stay

1 for cause to amend the complaint in her Lawsuit against PG&E and other entities. The
2 Lawsuit is based on the severe injuries Plaintiff sustained as a result of the hazardous
3 conditions on a walkway ("Incident"). Upon the filing of PG&E's bankruptcy case, all
4 actions against PG&E were stayed in the Lawsuit, but continued as to the Defendants. In
5 order for Plaintiff to continue prosecuting her claims in the Lawsuit as to the Defendants,
6 she must amend the complaint.

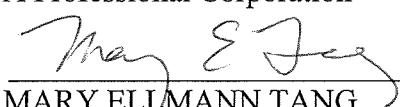
7 This motion does not seek to change the status quo in regards to PG&E. Plaintiff is
8 merely obtaining relief from stay to protect her rights in the Lawsuit.

9 The Plaintiff seeks relief from stay to amend the complaint in its pre-petition
10 personal injury Lawsuit to add a new defendant, clarify the description of the real property
11 where the Incident occurred, add new language to the Complaint regarding Plaintiff's
12 actions, remove defendants, and add new causes of action against existing defendants. The
13 Amended Complaint will not add any new causes of action against PG&E, nor is Movant
14 seeking relief from stay to pursue the Lawsuit against PG&E at this time

15 This motion shall be based on this Notice, the Motion, the Declaration of Steven L.
16 Derby, upon all papers, pleadings, and documents on file herein and on such documentary
17 evidence or oral argument as may be presented at the time of the hearing of this motion.

18 YOU ARE HEREBY NOTIFIED THAT IF YOU FAIL TO APPEAR AT THE
19 HEARING OF THIS MOTION PURSUANT TO THE LOCAL RULES OF THE UNITED
20 STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF
21 CALIFORNIA, THE COURT MAY GRANT THE MOVANT RELIEF FROM THE
22 AUTOMATIC STAY WITHOUT FURTHER HEARING.

23
24
25 Dated: January 28, 2020

26 FRENCH LYON TANG
A Professional Corporation
By: 
MARY ELLMANN TANG
Attorneys for CRISTINA MENDOZA
27
28